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[Proposed] Counsel to the Official Committee of Unsecured
Creditors

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

THE ROMAN CATHOLIC ARCHBISHOP OF
SAN FRANCISCO,

Debtor and Debtor in Possession.

Case No.: 23-30564

Chapter 11

**SUPPLEMENTAL DECLARATION OF
JOHN W. LUCAS IN SUPPORT OF
APPLICATION OF THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS FOR ORDER APPROVING
EMPLOYMENT OF PACHULSKI STANG
ZIEHL & JONES LLP AS COUNSEL TO
THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS**

I, John W. Lucas, declare as follows:

1. I am a partner at Pachulski Stang Ziehl & Jones LLP (the “Firm”). I am duly admitted and in good standing to practice law in the State of California, as well as the United States District Court for the Northern District of California, and also the State of New York. I submit this declaration in connection with the application [Docket No. 188] (the “Application”)¹ of the Official Committee of Unsecured Creditors (the “Committee”) in the above-captioned case (the “Case”) to retain the Firm as counsel to the Committee and to supplement the disclosures I made in my declaration filed with the Application.

¹ A capitalized term used but not defined herein shall have the meaning ascribed to it in the Application.

2. As set forth in my declaration filed with the Application, the Firm will be paid by the Debtor on an hourly basis using its regular hourly rates (as may be adjusted from time to time) and be reimbursed by the Debtor according to its customary reimbursement policies, *provided, however*, the Firm will discount its total fees to the lesser of the amount billed using regular hourly rates and a blended hourly rate of \$1,050.

3. None of the attorneys or paraprofessionals at the Firm vary their rates based on the geographic location of the bankruptcy case.

4. The Firm did not represent the Committee prior to the commencement of the Debtor's bankruptcy case as the Committee was not formed until after the commencement of the Debtor's bankruptcy case.

5. The Committee has approved the Firm's staffing of the case, which is subject to change as might be required by the facts that arise in the case. The Committee has not yet approved a budget because the case was recently commenced and the Firm recently engaged. The Firm will present budgets to the Committee as predictable work-streams are put in place and to the extent the Firm, as counsel to the Committee, can predict the steps or actions the Debtor intends to take as a debtor-in-possession.

6. For the reasons set forth in the Application, my original declaration and herein, I believe the Firm is qualified to represent the Committee under section 1103 of the Bankruptcy Code.

To the best of my knowledge, after conducting or supervising the investigation described above, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 17th day of October, 2023.

/s/ John W. Lucas

John W. Lucas

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CERTIFICATE OF SERVICE

1 STATE OF CALIFORNIA)
2 CITY OF LOS ANGELES)

3 I, Nancy H. Brown, am employed in the city and county of Los Angeles, State of California.
4 I am over the age of 18 and not a party to the within action; my business address is 10100 Santa
Monica Blvd., Suite 1300, Los Angeles, California 90067.

5 On October 17, 2023, I caused to be served the **SUPPLEMENTAL DECLARATION OF**
6 **JOHN W. LUCAS IN SUPPORT OF APPLICATION OF THE OFFICIAL COMMITTEE OF**
7 **UNSECURED CREDITORS FOR ORDER APPROVING EMPLOYMENT OF PACHULSKI STANG**
8 **ZIEHL & JONES LLP AS COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED**
9 **CREDITORS** in the manner stated below:

10 <input checked="" type="checkbox"/>	TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document was served by the court via NEF and hyperlink to the document. On October 6, 2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below
13 <input checked="" type="checkbox"/>	(BY MAIL) I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
16 <input type="checkbox"/>	(BY EMAIL) I caused to be served the above-described document by email to the parties indicated on the attached service list at the indicated email address.

17 I declare under penalty of perjury, under the laws of the State of California and the United
18 States of America that the foregoing is true and correct.

19 Executed on October 17, 2023 at Los Angeles, California.

20
21 /s/ Nancy H. Brown
Nancy H. Brown

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